

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHT DATA LTD.

Plaintiff,

v.

NETNUT LTD.

Defendant.

Case No. 2:21-CV-00225-JRG-RSP

**JOINT STIPULATED MOTION TO AMEND THE THIRD AMENDED DOCKET
CONTROL ORDER**

Plaintiff Bright Data Ltd. (“Plaintiff” or “Bright Data”) and Defendant NetNut Ltd. (“Defendant” or “NetNut”) (collectively, the “Parties”) jointly move to amend the third amended docket control order (“Order,” Dkt. 141). The current Order (Dkt. 141) granted the Parties May 2, 2022 joint motion to amend the second amended docket control order setting the close of fact discovery for May 9 and the deadlines for opening expert reports and rebuttal expert reports for May 16, 2022 and June 8, 2022 respectively. Since before the filing of the May 2 motion, the Parties have continued to actively engage in daily FRE 408 discussions to resolve the disputes between the Parties, coordinating between U.S. counsel and the respective Parties in Israel. To further accommodate FRE 408 discussions between the Parties in anticipation of a potential resolution, the Parties request the following extensions:

July 15, 2022	July 20, 2022	Sur-reply to Dispositive Motions (including <i>Daubert</i> Motions)
July 11, 2022	July 15, 2022	Reply to Dispositive Motions (including <i>Daubert</i> Motions).
July 6, 2022	July 11, 2022	*Response to Dispositive Motions (including <i>Daubert</i> Motions). Responses to dispositive motions that were filed <u>prior</u> to the dispositive

		motion deadline, including <i>Daubert</i> Motions, shall be due in accordance with Local Rule CV-7(e), not to exceed the deadline as set forth in this Docket Control Order. Motions for Summary Judgment shall comply with Local Rule CV-56.
June 22, 2022	June 27, 2022	*File Motions to Strike Expert Testimony (including <i>Daubert</i> Motions). No motion to strike expert testimony (including a <i>Daubert</i> Motion) may be filed after this date without leave of the Court.
June 22, 2022	June 27, 2022	*File Dispositive Motions No dispositive motion may be filed after this date without leave of the Court. <u>Motions shall comply with Local Rule CV-56 and Local Rule CV-7. <i>Motions to extend page limits will only be granted in exceptional circumstances. Exceptional circumstances require more than agreement among the parties.</i></u>
June 17, 2022	June 24, 2022	Deadline to Complete Expert Discovery
June 8, 2022	June 15, 2022	Serve Disclosures for Rebuttal Expert Witness
May 16, 2022	May 27, 2022	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
May 9, 2022	May 20, 2022	Deadline to Complete Fact Discovery and File Motions to Compel Discovery

The requested extensions will not affect the scheduled Pretrial Conference or Trial. The parties agree that there is good cause to extend the deadline including on the basis of current and ongoing discussions between the Parties to resolve the pending disputes.

Wherefore, the Parties respectfully requests the Court find good cause to modify the Order accordingly.

Dated: May 5, 2022

By: /s/ Ronald Wielkopolski

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***Attorneys For
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 5th day of May, 2022, with a copy of this document via electronic mail.

/s/ Ronald Wielkopolski

CERTIFICATE OF CONFERENCE

I hereby certify that the parties have complied with the meet and confer requirement in Local Rule CV-7(h). On May 5, 2022, counsel for Bright Data and NetNut conferred and agreed on filing the joint motion.

/s/ Ronald Wielkopolski